

To All,

I have put together an ever growing threat scenario for some USDA facilities, but it really could be applied to other USDA facilities as well. As the summer months come up, criminal activity usually increases due to opportunity crimes (example: if its there and I can get to it easily, I'm going to perpetrate the crime). No one wants to commit a crime in the wintertime, it's just too cold.

The threat for this scenario comes from animal right activists (see paragraph 1 below). The countermeasure for this threat, to some degree, as we have seen throughout the country, is the general use of contract guards. As we conducted our Risk Assessments based on this type of threat (through empirical data research) we see that this threat is credible.

Now let's talk about the use of contract security guards as one of the security countermeasure used to mitigate this threat/risk. These guards are only as good as they are controlled, monitored and established. I have provided a couple of articles (paragraphs 2 - 4) that depict several dynamics in security guard environments.

Paragraph 2 talks about lack of training, low wages and poor working conditions as reasons why guards should have collective bargaining representation. I would suggest that a properly managed and constructed guard contract would eliminate these three deficiencies. In paragraph 3 we see a story about guards that were not properly supervised and thus possible security compromises could have been the results. In paragraph 4 we can see that these guards do face dangers and therefore they must be properly trained to respond to these dangers.

Just because there may be guards at your facility, you should not fall into a comfort zone and assume everything is secure, as you can see in paragraph 3. Constant oversight through Quality Assurance measures, Supervision and Management must be present to ensure the integrity of the protected assets.

Guard Program Thoughts (these are just my thoughts and should not be taken as prescriptive).

a. I would think that a good guard contract should be constructed based on your own unique environment. You need to ask some key questions about the facility's critical assets. What do you want to protect and how do you want to protect it? Is the asset critical enough to use Deadly Force (Armed guards) or will unarmed guards suffice? There is a big cost difference usually between armed and unarmed guards. Maybe you can use a combination of both types of guards (just supervisors are armed (responding force), and the rest are unarmed). A lot of times we see Xeroxed copies of guard contracts because it is easy to do and the site saves time. The down side of drawing up a contract in this manner is it does not fit the site security requirements very well. It's possible that you may be worse off with a poorly constructed security contract than if you had none at all.

b. Guard Orders and Special Instructions are crucial in construction, performance, and sustainment. Your guard orders are general instructions to the guard to perform basic security related duties. The special instructions are additional specific security responsibilities that must be performed in critical areas. As an example of Guard Orders you would want to say in your guard order that the guards can not leave their post until properly relieved. The special instructions would be more mission specific and would say something to the effect the guard must monitor the temperature of the growth chamber and if over 60 degrees, will notify the first person on the alert roster. These orders must be tailored to fit each of your facility's security needs as they relate to mission critical assets. The last guard order should always address the special instructions and should say something like the guard will obey and comply with all special instructions.

c. Quality Assurance (QA), supervision, and management are key roles that should be assigned to responsible personnel. The COTR usually is the main focus for this oversight, but it could be delegated down appropriately either internally or through contract. QA and Supervision could be spelled out in the contract as a responsibility for the security guard company and the management would be the responsibility of the COTR. Conducting spot checks once in a while and asking the guard about their guard orders and special instructions goes a long ways to ensure security is being properly performed.

d. Rules of Engagement and Use of Force training/briefing is something we don't see a lot of during our visits to sites that have security guards. I would think it is very important to ensure the guards understand the rules of engagement and use of force policies, especially if they are armed.

e. Review of training records is something that will help in managing a guard contract and performance. If the guard is armed, check to see the last time they qualified/familiarized with their assigned weapon. When was the last time they had CPR training or a physical endurance test if that is a requirement of the contract? You should match these types of documents to the contract.

f. I would also think that underperformance penalty clauses should be in a contract to ensure compliance. Penalty clauses succeed if the components are combined effectively so that when you have problems, the vendor has a financial incentive to fix it. The correct verbiage is very important and should be coordinated through your procurement office.

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1. Animal Rights Activists Step up Terror Campaign - Source: Sunday Star Times (New Zealand) - 05/02/2004

Farmers and scientists are being targeted in an increasingly intensive campaign of fear by anti-vivisectionists and activists linked to the international Animal Liberation Front. A special police intelligence unit, which also deals with terror attacks, believes the groups are stepping up their activities. In the past year there have been death threats, cars doused in paint stripper and break-ins. Bomb threats have also been made by the groups, as has the delivery of a razor blade doused in "HIV" blood to a scientist. The tactics have led to the hiring of security specialists and even bodyguards by universities that use animals for research, research institutes, and poultry and egg producers. Representatives of one Auckland group, who were responsible for the raid on a poultry farm, told the Sunday Star-Times they wanted "an end to all farming." People who profit from farm animals don't have any right to live their life in comfort. A spokesman for the police threat assessment unit said animal rights protest action had become more frequent and direct, and had international links. "You're dealing with an amorphous group

of people who has no aim in life other than to attack anybody profiting from animals."

2. D.C. Leaders Call for Better Security Guard Training -
Updated: Tuesday, Apr. 27, 2004 - 4:52 PM

WASHINGTON -- At least two of the District's top elected officials are calling for higher training and performance standards for security guards who work in privately owned and managed buildings.

Delegate Eleanor Holmes Norton says she'll introduce federal legislation requiring those guards to meet standards set by the Department of Homeland Security. And D.C. Councilman Jim Graham says he will introduce local legislation aimed at accomplishing similar goals.

Both cite a study conducted by the Service Employees International Union. That group's Local 82 is now attempting to organize guards who work for several companies in the city. The union has targeted un-armed guards employed by Barton, Admiral and Securities. They cite a lack of training, low wages and poor working conditions as reasons why guards should have collective bargaining representation. There are an estimated two-thousand un-armed guards in D.C.

3. Six guards, supervisor removed after N-plant security lapse -
By Eve Modzelewski - Stuart News, April 28, 2004

Hutchinson Island · Six security guards and a supervisor have been removed from duty at the St. Lucie Nuclear Plant after Florida Power & Light Co. found the guards failed to complete their patrols, a XXXXXXXX Corp. official said Tuesday.

FPL's audit revealed the guards skipped portions of their rounds, taking shortcuts during patrols designed to detect and prevent fires, for example.

"Those who were identified as not fulfilling their responsibilities are no longer at the plant, and by that I mean they were let go," FPL spokeswoman Rachel Scott said.

The Nuclear Regulatory Commission has started its own investigation into security at the plant, but NRC spokesman

Roger Hannah would not say whether it was related to the recent failures.

FPL began its audit in March, after a security officer told plant managers certain guards were not completing their patrols, Scott said. FPL examined computer records tracking the location of guards and discovered some had not covered all their assigned areas.

4. Federal Protective Service (New York)

Box Cutter Assault on Contract Guard

On April 28, an NYC SSA claimant, XXXXXX XXXXXXXX (DOB: XXXXXXXX), swung a box cutter at the security guard. The NYPD and the FPS responded and arrested XXXXX. He will be charged with menacing in the second degree and criminal possession of a weapon.